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Filing date: **12/04/2013**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92056362
Party	Plaintiff Milano Series International Products, Ltd.
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Date	12/04/2013
Attachments	92056362-Consented Motion to Suspend.pdf(87513 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**  
**BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

MILANO SERIES INTERNATIONAL  
PRODUCTS, LTD.,

Petitioner,

V.

MILANO BAGS INC.

Respondent.

Cancellation No. 92/056362

Supplemental Registration No. 4,215,599

Mark: MILANO BAGS

**PETITIONER'S CONSENTED MOTION TO SUSPEND**

Milano Series International Products, Ltd. (“Petitioner”), by and through its counsel, hereby moves that the Trademark Trial and Appeal Board (“Board”) further suspend the current dates in the Cancellation proceeding through March 6, 2014. (Remaining dates will resume commencing with the Expert Disclosure due date.) Trademark Rule 2.117(c) and TBMP §510 (June 2013). Mr. Matthew Sawyers, counsel for Milano Bags Inc. (“Respondent”), consented to this Motion in a December 3, 2013 email communication.

Respondent provided Supplemental Responses to Petitioner’s First Set of Interrogatories and to Petitioner’s First Request for Production of Documents, Things and Electronically Stored Information. However, these included some deficient Responses, which have been specified to Respondent’s Counsel in a November 4, 2013 email from Petitioner’s counsel. “Without conceding” Petitioner’s “concerns regarding discovery”, Respondent’s counsel consents to the

further suspension. The suspension for three months through March 6, 2014 hopefully will allow time to clear up and complete the discovery issues stemming from Respondent's original and supplemental inadequate Responses.

Accordingly, the parties request the Board suspend the Cancellation proceeding as to all matters except for Respondent providing proper and complete original and Supplemental Responses to Petitioner's First Set of Interrogatories and to Petitioner's First Request for Production of Documents, Things and Electronically Stored Information, and the parties thereafter working to resolve any further discovery issues, if any, related thereto.

It is respectfully requested that dates be reset as shown below:

Proceedings Resume	03/07/2014
Time to Answer	closed
Deadline for Discovery Conference	closed
Discovery Opens	closed
Initial Disclosures Due	closed
Expert Disclosure Due	04/15/2014
Discovery Closes	05/15/2014
Plaintiff's Pretrial Disclosures	06/30/2014
Plaintiff's 30-day Trial Period Ends	08/15/2014
Defendant's Pretrial Disclosures	08/30/2014
Defendant's 30-day Trial Period Ends	10/15/2014
Plaintiff's Rebuttal Disclosures	10/30/2014
Plaintiff's 15-day Rebuttal Period Ends	11/30/2014

It is respectfully requested that the Board grant Petitioner's Consented Motion to Suspend and re-set remaining dates as set forth above.

Respectfully submitted,

MILANO SERIES INTERNATIONAL  
PRODUCTS, LTD.

By:



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Date: December 4, 2013

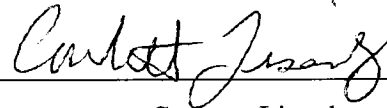
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Counsel for Petitioner

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing **Petitioner's Consented Motion to Suspend** was served on counsel for Respondent, this 4th day of December, 2013, by sending same via First Class mail, postage prepaid, to:

Matthew H. Swyers  
THE TRADEMARK COMPANY PLLC  
344 Maple Avenue West Suite 151  
Vienna, VA 22180

A handwritten signature in cursive script, appearing to read "Carlette Lisenby", is written over a horizontal line.

Carlette Lisenby